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ER/WM&I DDT

NPDES/FFCA
Source/Driver: (Name & Number from ISP, IAG milestone, Mgmt. Action, Corres. Control, etc.)

Closure #: (Outgoing Correspondence Control #, if applicable)

10/25/96
Due Date

Frank Rukavina
Originator Name

G. D. DiGregorio
QA Approval

J. E. Law
A. M. Tyson
Contractor Manager(s)

George H. Setlock
Kaiser-Hill Program Manager(s)

Document Classification Review Waiver Per Classification office

T. G. Hedahl
Kaiser-Hill Director

Document Subject: KH00003NS1A

Transmittal - National Pollutant Discharge Elimination System/Federal Compliance Agreement Semi-Annual Report - AMT-073-96

October 21, 1996 96-RM-ER-0189-KH

Discussion and/or Comments:

Enclosed are three copies of the Semi-Annual Progress Report which is required under Section V.C. of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA). The report covers FFCA activities during the period of April 1 through September 30, 1996 and is due to EPA on October 25, 1996.

Please contact John Law at extension 4842 or Frank Rukavina at extension 7370 if you have any questions.

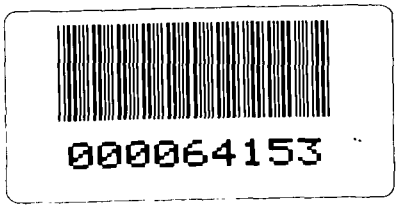
FR:slm

cc:
F. M. Huffman
K. R. Koebel
J. E. Law
K. M. Motyl
F. Rukavina
A. M. Tyson
RMRS Records

ADMIN RECORD

1/17

SW-A-004264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DRAFT

Date

John Stover
Environmental Compliance, Liaison Division
DOE, RFFO

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM/FEDERAL COMPLIANCE AGREEMENT SEMI-ANNUAL REPORT- GHS-XXX-96

The Semi-Annual Progress Report, as required under Section V.C. of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA), is enclosed for your review. The report covers FFCA activities during the period of April 1 through September 30, 1996 and is due to EPA on October 25, 1996. This correspondence also includes the Drain Identification Study (DIS) Closure Report. The only activities remaining under the FFCA are completion of the final phase of the Wastewater Treatment Plant Upgrades and the Tank Management Plan which will inspect 199 tanks in FY97 and is forecast to be completed in FY98.

Included in this correspondence is a draft letter for your use in transmitting the report to EPA. Please contact me at extension 4457 or John Law at extension 4842 if you have any questions.

George H. Setlock
Title

GHS:xxx

Enclosures:
As Stated

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DRAFT

Date 96-DOE-XXX

Michael Reed
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

RE: NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM, FEDERAL FACILITIES COMPLIANCE AGREEMENT SEMI-ANNUAL REPORT - XXX-XXX-96

The attached Semi-Annual Progress Report is required under Section V.C of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA). This report covers FFCA related compliance activities from April 1 through September 30, 1996 and includes the Drain Identification Study (DIS) Closure Report.

The DIS is an explicit requirement of Section 4.0 of the November 20, 1992, Chromic Acid Incident Plan (CAIP) which is incorporated in Section III.B of the FFCA. With the completion of the DIS, the only remaining CAIP compliance activity is the Tank Management Plan which is budgeted to inspect 199 tanks in FY97 and is forecast to be completed November 30, 1998. The other remaining activity under the FFCA is the completion of the final phase of the Wastewater Treatment Plant Upgrades which is under construction and will be completed in FY 97.

Attachment 1 is the NPDES FFCA Semi-Annual Progress Report. Attachment 2 provides a review of the completed scope of the DIS and a list of the buildings at Rocky Flats Environmental Technology Site (RFETS) with their final DIS status. Questions concerning this correspondence should be addressed to me at (303) 966-____ or to John Stover at (303) 966-9735.

Name
Title

XXX:xxx

Attachments:
As Stated

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NPDES FFCA
SEMI-ANNUAL
PROGRESS REPORT

(Attachment 1)

October 16, 1996

REPORT NUMBER 24

The NPDES Federal Facilities Compliance Agreement (FFCA) Section V.C.1 requires quarterly progress reports be submitted to EPA within 28 days following the end of the quarter. This reporting requirement was changed from quarterly to semi-annual in the EPA letter of March 6, 1996 (Ref: 8P2-W-P). This report is submitted in response to that requirement, and covers activities during the period April 1 through September 30, 1996.

FFCA Item	Required Action	Due Date	Status
FFCA Effective Date		March 25, 1991	Complete. Signed by DOE Rocky Flats Office, March 19, 1991. Signed by EPA Region VIII, March 25, 1991.
Effluent Limitations (Sect. I)	Effluent limitations for Outfall 001 apply at the STP discharge rather than Pond B-3. Chromium limitations at Outfalls 005, 006, and 007.	April 1, 1991	Complete. Monthly reporting was modified to incorporate revised effluent monitoring requirements. These changes were implemented beginning with the April 1991 Discharge Monitoring Report (DMR).
Effluent Monitoring (Sect. II)	Monitoring of STP effluent for volatile organic compounds and metals. Whole Effluent Toxicity (WET) monitoring of the STP effluent, and A-4, B-5, and C-2 pond discharges.	June 30, 1990	Complete. Monthly reporting has been modified to incorporate revised effluent parameters and monitoring requirements. These changes were implemented beginning with the April 1991 DMR. Data collected in good faith prior to the signing of the FFCA, between June 1, 1990 and March 30, 1991, were summarized and included with the Progress Report submitted for fourth quarter 1991. Whole Effluent Toxicity (WET) testing of the STP and the terminal ponds was decreased from monthly sampling and analyses to quarterly sampling and analyses per the September 1, 1992 letter to James Hartman signed by Glenn Rodriguez, EPA Region VIII. Quarterly WET testing of the STP and terminal ponds at discharge was implemented October 1, 1992.
Compliance Plan (Sect. III.A)	Submit a Compliance Plan to EPA to include a diagnostic evaluation of the STP, instrumentation upgrades, sludge drying bed improvements, and influent/effluent containment provisions.	July 30, 1990	Complete. Implementation of the Compliance Plan has been initiated (see following).

FFCA Item	Required Action	Due Date	Status
Compliance Plan (Sect. III.A - continued)	Influent Instrumentation to monitor pH, conductivity, and other STP influent parameters (Compliance Plan Sect.II.A.1)	May 1990	Complete.
	Autochlorination/ Dechlorination (Compliance Plan Sect.II.A.2)	March 1991	Complete.
	Instrumentation to include a Parshall flume, backwash control for sand filters, dissolved oxygen for aeration basin and additional effluent monitoring controls (Compliance Plan Sect.II.A.3)	December 1991	Complete.
	STP Facility Upgrades Phase I Drying Beds Capacity Improvements (Compliance Plan Sect II.B)	October 1992	Complete.
	STP Facility Upgrades Phase II Miscellaneous utility, equipment and facility upgrades (Compliance Plan Sect.II.C) STP Facility Upgrades Phase III Influent/effluent containment, nitrification/denitrification (Compliance Plan Sect.II.C)	Baseline Completion: October 1992 Forecast Completion: April 1996 TBD based on NPDES permit development	Complete. Design engineering was completed in December 1994, and the construction contract was awarded in April 1995. Construction commenced in May 1995 and was completed in April 1996. A solicitation was issued on October 3, 1995 for a design-Build subcontract for influent/effluent storage tanks. Contract was awarded February 1996; construction was delayed due to the removal of the OU9 process waste pipeline. Construction has commenced and completion is anticipated in early third quarter FY 97. The nitrification/denitrification portion of the project has been canceled because the unionized ammonia standard for the Walnut Creek drainage on plant site was removed.
	Perform a diagnostic evaluation of the STP and implement operational recommendations (Compliance Plan Sect.II.D)		Complete.

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FFCA Item	Required Action	Due Date	Status
Chromic Acid Incident Plan (Sect. III.B)	Submit a Chromic Acid Incident Plan (CAIP) to EPA addressing the findings of the Report of the Chromic Acid Incident Investigation at Rocky Flats.	November 15, 1990	Complete. Implementation of the CAIP has been initiated (see following).
	Tank Management Plan (CAIP Sect.1.1)	Baseline Completion: November 30, 1995 Forecast Completion: November 30, 1998	The Tank Management Plan is an above ground tank inspection and testing program. An initial inventory of 2685 tanks was completed September 15, 1994. The Master Tank Database currently contains a total of 2811 tanks. The initial testing and inspection cycle began as scheduled on December 1, 1992 and was scheduled to complete November 30, 1996. The new forecast completion date is November 30, 1998. To date all but 578 tanks have received visual inspection or ultrasonic testing. Tank inspections were not funded during FY96. In FY 97 the TMP is funded to inspect 199 tanks. Funding to complete the TMP will be pursued for FY98.
	Tank Surveillance Program (CAIP Sect. 1.2)	December 22, 1992	Complete.
	Instrumentation Development (CAIP Sect.2.0)	Ongoing	Respirometer. Complete. Microtox Toxicity Test. Complete Telemetry and Water Quality Reporting. Remote monitoring equipment located at ten sites has been collecting and reporting water quality and surface water flow data for some 57 months. Data is used to supplement regulatory reporting requirements for the DMR and the NPDES monthly reports for flow discharge.
	Geotechnical Evaluation of the B-5 Dam Structure (CAIP Sect.3.0)	August 31,1993	Complete.
	Drain Identification Study (CAIP Sect.4.0)	Baseline Completion: March 31,1996 Forecast Completion: September 30, 1996 Completed: August 30,1996	Complete. The Drain Identification Study (DIS) *was* a source control program conducted in buildings which contain inappropriate sources of influent to the sanitary sewer system. The DIS rescope excluded low potential risk Buildings from the DIS and was accepted by EPA correspondence on March 6, 1996. Of the Site's 196 buildings the DIS inspected 114 moderate to high risk potential buildings. 71 buildings were excluded from inspection after initial walkdowns and 11 buildings either no longer existed or were exempted as terminal process waste pits.
Groundwater Monitoring Plan for the Sludge Drying Beds (Sect. IV.C)	Submit a groundwater monitoring plan to EPA for the area beneath the STP sludge drying beds.	July 30, 1990	Complete.

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(Attachment 2)

Rocky Flats Environmental Technology Site
Drain Identification Study
Closure Report

Introduction

The Drain Identification Study (DIS) was initiated to support the Rocky Flats Environmental Site's (Site) increased emphasis on source control and to reduce the possibility of an inadvertent release of hazardous substances to the Wastewater Treatment Plan (WWTP). The DIS was first developed during the Site's Building Resumption effort in FY91 and later incorporated into the Chromic Acid Incident Plan (CAIP). DIS field inspections began in the first quarter of FY93 and were completed on August 30, 1996 in compliance with the Site's rescope proposal which was accepted by the Environmental Protection Agency's (EPA) correspondence on March 6, 1996.

NPDES FFCA / CAIP Requirements

The commitments made in the CAIP regarding the DIS were that "building drain evaluations will be conducted in all buildings which contain potential contaminants plantwide." Elements of this activity were specifically defined as follows:

A. Develop risk assessment criteria for building drain evaluations.
B. Develop procedures for drain study field evaluations.
C. Develop a schedule and task breakdowns for drain study field evaluations.
D. Field evaluations
   - Identification of possible contaminant sources and risk areas within buildings.
   - Verification that all floor and sink drains are labelled.
   - Verification that all floor and sink drains in risk areas, as they relate to the WWTP, or areas containing radioactive or hazardous materials, are labelled as process waste drains.
   - Verification that all floor and sink drains labelled as process waste drains do not feed into the sanitary waste system.
   - Evaluation of building and footing drains.

The CAIP further committed that "...sanitary drains identified in potential hazard areas must be secured against inadvertent discharge with a locking mechanism until permanent corrective action can be taken. In addition to identifying all drains, other possible effluent pathways will be identified and evaluated, and drain labels will be inspected. Dye testing will be used to verify potential connections to the sanitary sewer. Deficiencies will be tracked and corrective action reviewed prior to closing findings".

FFCA Rescope

Fiscal Year (FY) 96 budget shortfalls necessitated a hard look at all programs, including the DIS, for ways to reduce costs, while still assuring regulatory compliance and protection of the public and the environment. On October 12, 1995, DOE developed an accelerated completion plan for FFCA activities (*Rescope of the Remaining Activities Required Under the NPDES FFCA)* which was transmitted to EPA for their concurrence, along with the NPDES FFCA Third Quarter 1995 Progress Report. DIS project procedures were developed to meet the requirements of the original CAIP and the DIS operated to that scope of work until March 1996 when the DIS Project Plan was modified to reflect the rescoped FFCA.

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The DIS was rescoped to enable RMRS to complete field inspection in FY96 and FFCA progress reporting requirements were changed from quarterly to semi-annual. A rescoped DIS Project Plan was developed which addresses only the DIS activities specified in the DOE-RFFO rescope proposal. The rescope included inspection of the moderate and highest risk (those presenting the highest potential for inadvertent discharge of hazardous substances to the sanitary system) facilities, and completion of final reports. Detailed evaluation of chemicals of concern (COCs), and deficiency and corrective-action tracking were deleted from the project scope. The inspections included field work, pathways evaluation, and risk management, dye testing performed as required and a final report for each building. Under the DIS rescope it became the responsibility of building management to verify that all drains are properly labeled, that all drains in risk areas (i.e., those areas containing radioactive or hazardous materials) are labeled as process waste, and that process waste drains do not feed into the sanitary sewer system if the drain had not previously been dye tested by the DIS.

Closure Summary

As referenced in the DIS Building Status List, there are 196 buildings at the Site. Under the original scope of the DIS, 25 buildings were completed with approximately 1,262,59 square feet of building area inspected. As the FFCA rescope was proposed, a thorough walkdown of each uninspected building was performed to identify those buildings which presented a low risk for a potential discharge of inappropriate influent to the WWTP. The walkdowns resulted in the exclusion of 71 buildings from the rescoped DIS.

An additional 89 moderate to high risk buildings were completed under the rescoped DIS. These inspections included approximately 1,130,606 square feet of building area. The Site's remaining 11 buildings were exempt from inspection for one of two reasons: either the building no longer existed at the Site, or it was a process waste transfer pit. Process waste pits were excluded from inspection requirements after a review of the pits design criteria negated suspicions that drains would be located in these areas and due to the worker health risks associated with entering these inaccessible areas.

DIS inspections are not planned after FY96, but procedures for inspecting drains and a database of drain activities, along with building drawings, will be placed in configuration control for general Site use. Building operations personnel can access DIS information building drain drawings and dye-testing support by contacting the RMRS Surface Water Group.

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DIS BLDG STATUS LIST

Inspection Priority	BLDG		PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION

Risk Class Definition

A	[Pu, Historical Incidents][Chemicals above an RQ value][Plutonium Access][Toxic Chemicals][U, Be][Acids & Ammonium's][Waste]
B	Paints, Oils, Solvents, Non-Radiological Storage/Warehouses
C	No Known Risk

Legend

25			Buildings completed under original scope	1,262,059		
89			Buildings completed under revised scope	1,130,606		
71			Buildings Excluded - after walkdown	387,751		
11			Buildings Excluded - Buildings that were not located or exempt due to process waste pit status	13,075		
			Summary of Total Square Footage	**2,793,491**		

1	1	701		MAINTENANCE	5,180	C	PILOT BUILDING, No Known Risk
2	2	910		REVERSE OSMOSIS	9,066	A	Solar Ponds
3	3	444		MANUFACTURING	161,980	A	*Economic Development* , U, Be
4	4	445		CARBON STORAGE	3,200	A	Carbons
5	7	865		MATERIAL & PROCESS DEVELOPMENT	37,980	A	*Economic Development* , 1 RQ of Oil
6	8	374		PROCESS WASTE TREATMENT	62,787	A	Process Waste & 10 RQ'S of Nitric Acid
7	9	771		PLUTONIUM RECOVERY FACILITY	151,133	A	Plutonium
8	10	771	B	CARPENTER SHOP	(BLDG 771)	A	Connected to 771
9	11	771	C	NUCLEAR WASTE PACKAGING	(BLDG 771)	A	Nuclear Waste
10	12	774		WASTE TREATMENT PLANT	25,060	A	Solvent 55 Gal & Acids
11	13	371		PLUTONIUM RECOVERY	300,000	A	Plutonium
12	15	707		MANUFACTURING	197,770	A	Plutonium
13	17	776		MANUFACTURING	156,200	A	Plutonium
14	18	777		ASSEMBLY	74,820	A	General Chemicals
15	19	779		PLUTONIUM DEVELOPMENT	64,790	A	Plutonium
16	23	987		STORAGE VAULT	64	A	Plutonium
17	30	708		COMPRESSOR	7,460	A	1 RQ of Oil

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DIS BLDG STATUS LIST

	Inspection Priority	BLDG	PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION
18	46	554	STORAGE & SHIPPING	1,180	A	1 RQ of Oil
19	76	830	ISOLATED POWER SUPPLY (881)	184	A	Batteries
20	94	553	WELDING SHOP	1,280	B	Paints
21	98	453	OIL STORAGE	384	B	Oils
22	104	427	EMERGENCY GENERATOR (444)	312	B	Oils
23	156	928	FIRE WATER PUMP	504	C	No Known Risk
24	159	993	SECURITY STORAGE	690	C	No Known Risk
25	197	993 A	SECURITY STORAGE	35		
			Square Footage Totals	1,262,059		

DIS BLDG STATUS LIST

	Inspection Priority	BLDG	PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION
1	5	447	MANUFACTURING	23,100	A	*Economic Development* , Uranium
2	6	448	STORAGE	2,550	A	Uranium
3	14	559	PLUTONIUM ANALYTICAL LAB	32,890	A	Plutonium
4	16	778	SERVICES	31,220	A	RCA Locker Rm, Paints
5	20	883	ROLLING & FORMING	60,500	A	*Economic Development* , U & Oils
6	21	991	PRODUCT WAREHOUSE	37,880	A	Plutonium
7	22	886	NUCLEAR SAFETY FACILITY	10,360	A	Plutonium
8	24	996	STORAGE VAULT	120	A	Plutonium
9	25	997	STORAGE VAULT	1,035	A	Plutonium
10	26	998	STORAGE VAULT	690	A	Plutonium
11	27	999	STORAGE VAULT	384	A	Plutonium
12	28	123 S	HAZARDOUS WASTE STORAGE	135	A	Plutonium & Waste
13	29	123	HEALTH PHYSICS	18,580	A	Many RQ's of Many Items
14	31	515	SUBSTATION NO. 5	225	A	200 + Gal Oil
15	32	516	SUBSTATION NO. 6	225	A	200 + Gal Oil
16	33	517	SUBSTATION NO. 7	270	A	200 + Gal Oil
17	34	518	SUBSTATION NO. 8	270	A	200 + Gal Oil
18	35	555	SUBSTATION NO. 2	450	A	200 + Gal Oil
19	36	661	SUBSTATION NO. 1	90	A	200 + Gal Oil
20	37	675	SUBSTATION NO. 3	378	A	200 + Gal Oil
21	39	551	GENERAL WAREHOUSE	44,140	A	40 RQ'S of Calcium Hypochlorite
22	40	788	CEMENTATION PROCESS	2,394	A	15 RQ's of Calcium Chloride
23	41	443	HEATING PLANT	18,606	A	12 RQ'S of Sodium Hydroxide
24	42	867	FILTER PLENUM (W OF 865)	405	A	10 RQ'S of Calcium Hypochlorite
25	43	715	EMERGENCY GENERATOR (771,774)	700	A	Oils & 10 RQ'S of Calcium Hypochlorite
26	44	124	WATER TREATMENT PLANT	12,310	A	4 RQ's OF Calcium Hypochlorite
27	45	702	PUMP HOUSE (712)	980	A	1 RQ of Oil
28	47	566	PROTECTIVE CLOTHING DECONTAMINATION	5,400	A	Plutonium Access
29	48	889	EQUIPMENT DECONTAMINATION	3,260	A	Plutonium Access
30	50	729	FILTER PLENUM (779)	2,740	A	Plutonium Access
31	51	782	FILTER PLENUM (779)	6,200	A	Plutonium Access
32	52	561	FILTER PLENUM	5,660	A	Plutonium Access
33	53	868	FILTER PLENUM (E OF 865)	405	A	Plutonium Access

DIS BLDG STATUS LIST

	Inspection Priority	BLDG	PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION
34	54	875	FILTER PLENUM (886)	3,902	A	Plutonium Access
35	58	528	PROCESS WASTE PIT (559)	200	A	Plutonium Access
36	59	125	STANDARDS LABORATORY	16,440	A	Trichloroethylene & Oils
37	60	373	COOLING TOWER	1,764	A	Sulfuric Acid 1/4 RQ
38	61	122	MEDICAL	9,120	A	Potential Pu, etc.
39	62	879	FILTER PLENUM (883)	810	A	Uranium Access
40	63	450	FILTER PLENUM (S OF 444)	2,500	A	Uranium & Be Access
41	64	455	FILTER PLENUM (444 PLATING)	184	A	Uranium Access
42	65	451	FILTER PLENUM (S OF 447)	625	A	Uranium Access
43	66	881 F	MANUFACTURING & GENERAL SUPPORT	(BLDG 881)	A	Acids & Ammonium's
44	68	881	MANUFACTURING & GENERAL SUPPORT	245,200	A	Acids & Ammonium's
45	69	381	FLUORINE	1,320	A	Fluorine
46	70	772	FLUORINE STORAGE	410	A	Fluorine
47	71	988	TERTIARY TREATMENT PUMP	1,225	A	Ammonium Sulfates
48	72	442	FILTER TEST LAB & STORAGE	7,480	A	Bacteria Enzymes Alive
49	73	714	HF STORAGE	625	A	Hydrofluoric Acid
50	74	703	PUMP HOUSE (713)	1,140	A	Sulfuric Acid 1/3 of RQ
51	75	764	PIDAS DATA COLLECTION	1,617	A	Batteries & Some Paint
52	77	331	GARAGE & FIRE STATION	23,540	A	Battery Acid & Oils
53	80	770	WASTE DRUM STORAGE	1,140	A	Waste
54	82	887	SEWAGE & PROCESS WASTE LIFT	1,555	A	Process Waste
55	83	664	WASTE STORAGE & SHIPPING	17,393	A	Waste & Paints
56	84	439	MOD CENTER/MACHINE SHOP	5,140	B	Oils & Solvents
57	85	440	MOD CENTER	34,320	B	Oils & Solvents
58	86	334	MAINTENANCE	42,950	B	Oils & Solvents
59	87	449	OIL & PAINT STORAGE	2,440	B	Oil & Paint
60	88	885	PAINT & OIL STORAGE	225	B	Oil & Paint
61	90	111	ADMINISTRATION	44,046	B	Photo Lab
62	91	333	PAINT SHOP & SAND BLAST	3,060	B	Paints
63	92	705	COATING LAB	4,186	B	Paints
64	93	223	NITROGEN SUPPLY FACILITY	1,140	B	Paints, Oil in small amounts
65	95	863	ELECTRICAL TRANSFORMER	225	B	Oils
66	96	556	METAL CUTTING	225	B	Oils

DIS BLDG STATUS LIST

	Inspection Priority	BLDG	PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION
67	99	460	CONSOL. NON-NUC. MANUFACTURING	230,000	B	Oils
68	100	989	EMERGENCY GENERATOR (991)	256	B	Oils
69	102	727	EMERGENCY GENERATOR (782)	384	B	Oils
70	103	127	EMERGENCY GENERATOR	500	B	Oils
71	106	827	EMERGENCY GENERATOR (865, 875, 883 & 886)	380	B	Oils
72	107	428	WASTE COLLECTION PUMP	450	B	Oils
73	108	231	PUMP HOUSE	225	B	Oils
74	112	964	STORAGE	1,794	B	Storage
75	114	884	WAREHOUSE	3,240	B	Storage
76	116	666	STORAGE	486	B	Storage
77	118	130	PRODUCTION SUPPORT & WAREHOUSE	81,700	B	Repro & Warehouse
78	110	985	FILTER PLENUM (966, 997 & 999)	4,720	C	No Known Risk
79	121	575	POWER STATION	450	C	No Known Risk
80	127	718	COOLING TOWER	176	C	No Known Risk
81	135	454	COOLING TOWER	432	C	No Known Risk
82	136	457	COOLING TOWER	120	C	No Known Risk
83	150	765	SECONDARY ALARM CENTER	960	C	No Known Risk
84	153	549	ALARM SYSTEMS OFFICES	1,920	C	No Known Risk
85	157	995	SEWAGE TREATMENT FACILITY	600	C	No Known Risk
86	174	992	GUARD POST	64	C	No Known Risk
87	195	558	POWER SUB-STATION	450		
88	196	974	SLUDGE DRYING BEDS	1,200		
89		891	Building added to evaluation list			
			Square Footage Total	1,130,606		

DIS BLDG STATUS LIST

	Inspection Priority	BLDG	PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION
1	89	441	PRODUCTION SUPPORT	17,790	B	Developers
2	97	128	VEHICLE SHELTER	690	B	Oils
3	101	377	AIR COMPRESSOR	21,046	B	Oils
4	105	562	EMERGENCY GENERATOR (561)	380	B	Oils
5	109	750	PRODUCTION ENGINEERING SUPPORT	57,170	B	Some Paints
6	111	965	STORAGE	1,406	B	Storage
7	113	880	STORAGE	800	B	Storage
8	115	663	STORAGE & SHIPPING	3,600	B	Storage
9	119	968	CONTRACTOR WAREHOUSE	6,400	B	Storage
10	117	126	SOURCE STORAGE	140	C	No Known Risk
11	120	662	PLANT POWER	810	C	No Known Risk
12	122	780	FLAMMABLE STORAGE	450	C	No Known Risk
13	123	709	COOLING TOWER	1,260	C	No Known Risk
14	124	711	COOLING TOWER	966	C	No Known Risk
15	125	712	COOLING TOWER	780	C	No Known Risk
16	126	713	COOLING TOWER	555	C	No Known Risk
17	128	784	COOLING TOWER	243	C	No Major Hazard Potential
18	129	785	COOLING TOWER	64	C	No Major Hazard Potential
19	130	786	COOLING TOWER	243	C	No Major Hazard Potential
20	131	787	COOLING TOWER	176	C	No Major Hazard Potential
21	132	890	COOLING TOWER	220	C	No Known Risk
22	133	563	COOLING TOWER	100	C	No Known Risk
23	134	560	COOLING TOWER	100	C	No Known Risk
24	137	462	COOLING TOWER	81	C	No Known Risk
25	138	783	PUMP, TOWER WATER (779)	324	C	No Major Hazard Potential
26	139	952	ISOLATED GAS STORAGE	96	C	No Known Risk
27	140	552	GAS STORAGE	4,170	C	No Known Risk
28	142	710	STEAM VALVE HOUSE	120	C	No Known Risk
29	143	61	WAREHOUSE	58,200	C	No Known Risk
30	144	869	GAS METER HOUSE	400	C	No Known Risk
31	145	668	DRUM CERTIFICATION	1,040	C	No Known Risk
32	146	780 B	GAS BOTTLE STORAGE	120	C	No Known Risk
33	147	775	SEWAGE LIFT STATION	70	C	No Known Risk
34	148	980	CONTRACTOR METAL SHOP	13,130	C	No Known Risk
35	149	335	FIRE TRAINING	2,160	C	No Known Risk
36	151	378	PUMP HOUSE (808)		C	No Known Risk
37	152	129	RAW WATER STRAINER	225	C	No Known Risk

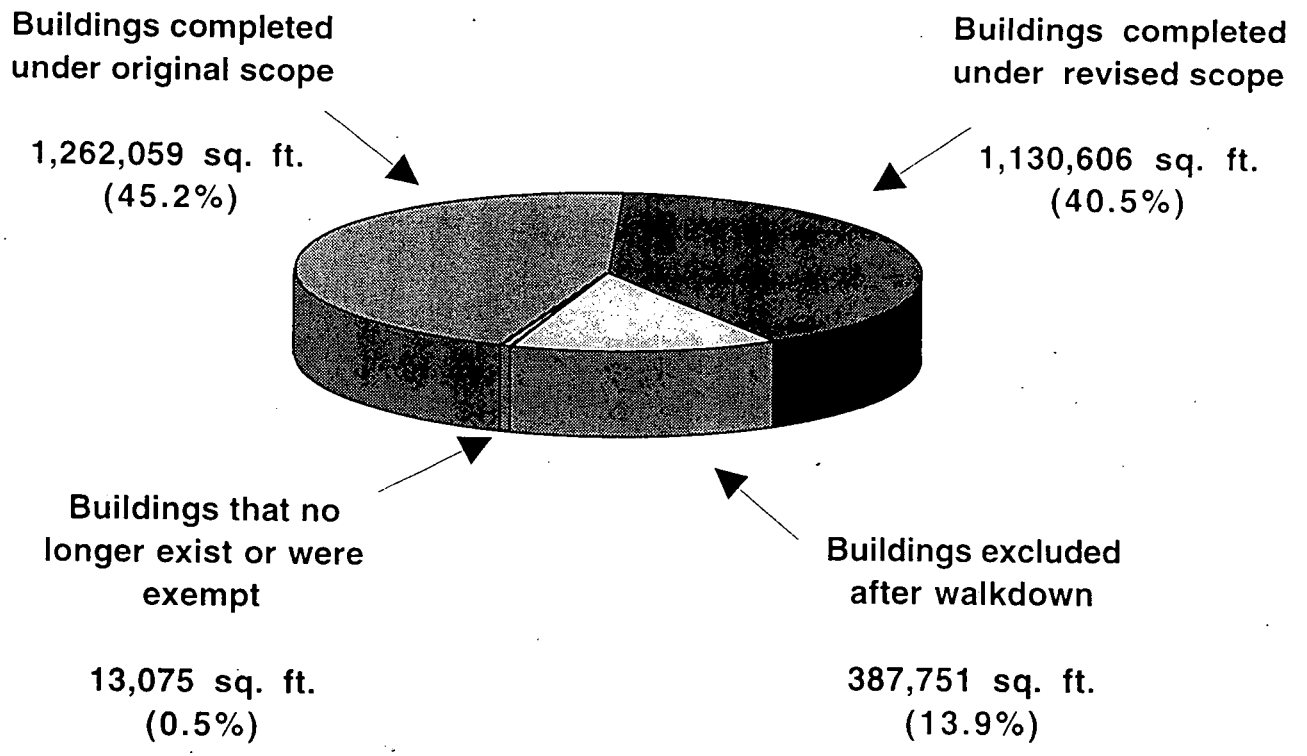
DIS BLDG STATUS LIST

	Inspection Priority	BLDG	PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION
38	154	569	CRATE COUNTER	2,280	C	No Known Risk
39	155	882	GAS CYLINDERS STORAGE	120	C	No Known Risk
40	160	984	SHIPPING CONTAINER STORAGE	5,000	C	No Known Risk
41	161	570	CRATE COUNTER SUPPORT	432	C	No Known Risk
42	162	780 A	METAL STORAGE	64	C	No Known Risk
43	163	367	STORAGE SHED	414	C	No Known Risk
44	164	112	CAFETERIA	9,280	C	No Known Risk
45	165	762	GUARD POST (CENTRAL & 9TH)	120	C	No Known Risk
46	166	773	GUARD POST	190	C	No Known Risk
47	167	792	GUARD POST (N OF 771)	64	C	No Known Risk
48	168	762 A	PERSONNEL ACCESS CONTROL (707)	900	C	No Known Risk
49	169	792 A	PERSONNEL ACCESS CONTROL (771)	900	C	No Known Risk
50	170	372 A	PERSONNEL ACCESS CONTROL (371)	1,725	C	No Known Risk
51	171	372	GUARD POST	225	C	No Known Risk
52	173	920	GUARD POST (E ACCESS)	447	C	No Known Risk
53	175	864	GUARD POST	1,160	C	No Known Risk
54	176	888	GUARD POST	144	C	No Known Risk
55	177	557	GUARD POST	225	C	No Known Risk
56	178	446	GUARD POST	299	C	No Known Risk
57	179	461	GUARD POST	225	C	No Known Risk
58	181	113	GUARD POST	324	C	No Known Risk
59	182	120	GUARD POST (W ACCESS)	447	C	No Known Risk
60	183	131	PERSONNEL & ACCESS CONTROL	22,000	C	No Known Risk
61	184	706	LIBRARY	4,000	C	No Known Risk
62	185	564	PRE-ENGINEERED BLDG	3,000	C	No Known Risk
63	186	850	LOGISTICS	37,000	C	No Chemical Tracking
64	187	376	PRE-ENGINEERED BLDG	3,000	C	No Known Risk
65	188	122 S	SHREDDER SHED	100	C	No Known Risk
66	189	115	DOE & EOC	17,000	C	No Known Risk
67	190	119	PLANT SECURITY	11,200	C	No Known Risk
68	191	121	PLANT PROTECTION	10,654	C	No Known Risk
69	192	452	PRE-ENGINEERED BLDG	6,000	C	No Known Risk
70	193	250	WIND SITE	22,500	C	No Known Risk
71	194	60	TRAINING FACILITY	30,787	C	No Known Risk
			Square Footage Total	**387,751**		

DIS BLDG STATUS LIST

	Inspection Priority	BLDG	PRIMARY USE	SQ. FT.	RISK CLASS	JUSTIFICATION
1	38	253	SWITCHGEAR	500	A	200 + Gal Oil
2	49	732	LAUNDRY WASTE PIT (778)	64	A	Plutonium Access
3	55	731	PROCESS WASTE PIT (707)	144	A	Plutonium Access
4	56	728	PROCESS WASTE PIT (771)	484	A	Plutonium Access
5	57	730	PROCESS WASTE PIT (776)	120	A	Plutonium Access
6	78	828	PROCESS WASTE PIT (881)	64	A	Hazardous Waste
7	79	866	PROCESS WASTE TRANSFER	324	A	Waste
8	67	772 A	ACID STORAGE (SE OF 771)	50	A	Acids
9	81	429	PROCESS WASTE PIT (441)	225	A	Waste Waters
10	141	966	ELECTRICAL & PLUMBING SHOP	3,100	C	No Known Risk
11	158	967	CONTRACTOR LOCKER ROOM	8,000	C	No Known Risk
			Square Footage Total	**13,075**		

Drain Identification Study Completion Report



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